

Second Level Domains Policy Review - Submission

From: Bruce Clement

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Thank you for the opportunity to comment on the Second Level Domains (2LD) policy. I have an interest in this policy as I am the current registrant of over 1,000 .co.nz domain names and am also a member of InternetNZ.

Currently New Zealand's .nz registry allows only twelve 2LDs. Eight of these .ac.nz, .co.nz, .geek.nz, .gen.nz, .maori.nz, .net.nz, .org.nz and .school.nz are "unmoderated" meaning anyone can register a name in these second level domains while the other four: .cri.nz, .govt.nz, .health.nz, .iwi.nz, .mil.nz and .parliament.nz are "moderated" so that only those meeting the requirements of each 2LD's rules can register the name.

As I recall, back in the 1990s all second level domains except .gen.nz were moderated to one level or another with .co.nz for companies, .net.nz for domains related to keeping the Internet going in New Zealand, etc with .gen.nz for everything that didn't fit in anywhere else. Just about everyone abided by these rules with only a very few apparent anomalies, for example Actrix, my first ISP, was for obscure historical reasons then using actrix.gen.nz. There are still around 1,200 .gen.nz domains registered (about 0.3% of the total) only slightly more than the 1,000 odd .govt.nz names.

At some point these rules were changed and anyone was allowed to register names in any of what are now the unmoderated 2LDs. From then on the unmoderated names except .co.nz started to become meaningless as people began to register in .co.nz by default except in a few special cases. Examining the September 2009 statistics published by the Domain Name Commission at http://dnc.org.nz/content/09_historical_stats.html shows roughly 86% of all registered domains are .co.nz with another 5% in each of .net.nz and .org.nz giving 97% in these three levels. Another 1% is shared between the nominally educational .ac.nz and .school.nz with the registration figures for the other 2LDs being pretty much at the level of background noise. It would be interesting to know how many of the 5% .net.nz and 5% .org.nz names are held by the same registrant as the .co.nz, unfortunately this figure is not available.

Except for a few specialist applications, .co.nz is where the type-in traffic is, where the customers go and where businesses should be. With their ".nz is our home" campaign, the Domain Name Commission is currently promoting the other 2LDs, but realistically the combination of the 86% market penetration of .co.nz and the fact that Internet users have been so well trained to type .co.nz, is going to make this very difficult to achieve. I can't see any likely benefit in the near future for creating more unmoderated 2LDs and am happy that the current policy will continue to discourage frivolous requests for new unmoderated 2LDs.

The moderated 2LD names could be useful if they are properly promoted. Their big strength is that they go a long way to avoiding phishing attacks in the .nz namespace; when you go to a .govt.nz site, you know it is an official government site. If the banker's association could convince its members to play ball and promote it, you'd know when you went to a .bank.nz site that you were dealing with a registered bank. I like the British .ltd.uk and wish we had moderated .inc.nz, .ltd.nz etc so there was a guarantee that you really were connecting to the organisation you wanted. What if when

you registered a company, the companies office could also issue you with a .ltd.nz domain name? Rather than passively waiting for interested groups to propose new moderated second level domains, I'd like to see InternetNZ advocating the creation of 2LDs to suitable moderators. When InternetNZ proposes the moderated 2LD, the fee should be waived as a public good. I'm suggesting the InternetNZ does this advocacy rather than the DNC as this avoids confusing the DNC's role as the administrator of policy with the active promotion role. If InternetNZ does not feel it is the appropriate body to do this advocacy, it would be appropriate for them to delegate the role.

It would be useful for some of existing unmoderated 2LDs to become moderated. For example, the .ac.nz 2LD would be far more useful if restricted to NZQA accredited degree level institution. This does create a problem with the existing 1700 registered .ac.nz domains for which I can't see an easy solution.

The biggest question in a review of 2LDs is should we have them at all? Some top level domains (e.g. .com, .tv) allow people to register a name immediately under the top level domain. Other top level domains provide a restricted number of names immediately under the top level domain such as .me.uk, .com.au, .co.nz and allow registration only at the third level. Some registration schemes, such as the Chinese .cn registry allow a hybrid system. I'm sure that some would believe that, except for the existing second level names, we should allow domain names to be registered directly at the .nz level (e.g. DNC.nz instead of DNC.org.nz). If 2LDs have a purpose then I'm not convinced that this is a good idea, because as soon as this is done the good names will be snapped up in a frenzy and the creation of new, moderated, second level domains with meaningful extensions as suggested above will become very difficult.

Unfortunately there is one loophole in the moderated 2LD policy that allows organisations sponsoring them to effectively avoid the 2LD: they can register www.<<2ld>>.nz and then use that for a web site creating the appearance, if not the reality, of having a domain registered directly under .nz. An example of this was the 2006 registration of www.parliament.nz. To prevent this happening again with future moderated 2LDs I'd like to suggest that the policy is changed to either prevent the registration of new www (and any future highly popular names) or to register them to the DNC. If registered to the DNC the domain could point to a 1 page web-site giving the rules and moderator contact details for the 2LD.

Yours Sincerely,

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